



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 N. 5<sup>th</sup> STREET  
KANSAS CITY, KANSAS 66101

AIR PERMITTING AND  
COMPLIANCE BRANCH

June 30, 2004

Leann Tippet Mosby, Staff Director  
Air Pollution Control Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

Dear Ms. Tippet Mosby,

We appreciate the opportunity to review and provide comments on the proposed PSD permit for the City Utilities of Springfield, Southwest Power Station Unit 2. Because of time limitations on our part, we were only able to focus on a few aspects of the permit, including SO<sub>2</sub> BACT, continuous particulate matter monitoring systems, the need for additional periodic testing for HAPs close to the 112(g) applicability threshold, and a few other miscellaneous items. We may provide additional comments on the modeling aspects of the permit at a later date.

Our most significant comment is on SO<sub>2</sub> BACT. This is an issue that we have briefly commented on in other coal-fired projects in Region 7, but have not studied as carefully as we should have. Based on our analysis, described in more detail in the attached comments, we believe it is time to break away from the BACT determinations made during the past couple of years and take a fresh look at the issue. We encourage MDNR to carefully consider our comments and either establish a firm performance requirement for the scrubber or a range of BACT limits corresponding to the fuels that will actually be burned at the City Utilities Southwest power plant. We intend to make similar comments on the other coal-fired projects now under consideration and plan to share these comments with the other Region 7 states.

As always, we appreciate the MDNR's efforts in carrying out the PSD program. If you have any questions, please contact Jon Knodel at (913) 551-7622 or at [knodel.jon@epa.gov](mailto:knodel.jon@epa.gov).

Sincerely,

JoAnn Heiman, Acting Chief  
Air Permitting and Compliance Branch

Attachments: "Comments on the Proposed PSD Permit for City Utilities of Springfield,  
Southwest Power Station Unit 2"  
Analysis of Annual SO<sub>2</sub> Inlet Rates for NSPS Subpart D Units in Region 7  
Analysis of Monthly SO<sub>2</sub> Inlet Rates for Public Power NSPS Subpart D Units in  
Region 7

## **Comments on the Proposed PSD Permit for City Utilities of Springfield, Southwest Power Station Unit 2**

1) The SO<sub>2</sub> “baseline” selected by City Utilities to evaluate BACT appears not to be representative of the coals historically used from the Powder River Basin and should be re-evaluated as described in the comments below.

The department proposes a SO<sub>2</sub> BACT limit of 0.12 #/mmBtu, 30-day rolling average. The limit is premised on the use of a worst case “baseline” fuel with a SO<sub>2</sub> inlet potential of 1.462 #/mmBtu in conjunction with a 92 percent removal using a dry spray dry adsorber. The BACT limit would apply at all times and would presumably allow for lesser scrubber performance if lower sulfur fuels are burned. While it is conceivable that City Utilities might have occasion to use a higher sulfur coal, during periods when the lower sulfur coal is unavailable or otherwise uneconomical, the long term use of such a “baseline” fuel appears to be unlikely based on historical trends observed over the last 24 years for uncontrolled NSPS utility boilers in Region 7.

Based on an evaluation of CEMS data reported for all uncontrolled NSPS Subpart D utility boilers in Region 7, the inlet SO<sub>2</sub> potential for coals combusted from 1980 through 2002 ranged from 0.87 to 0.62 #SO<sub>2</sub>/mmBtu, annual average, respectively. See Attachment A for more details. In the years prior to implementation of the acid rain program, uncontrolled NSPS utility units in Region 7 burned coal with a SO<sub>2</sub> potential of 0.87 - 0.73 #SO<sub>2</sub>/mmBtu, with the trend generally declining. In the years following implementation of the acid rain program, uncontrolled NSPS utility units in Region 7 burned coal with a SO<sub>2</sub> potential of 0.71 - 0.62 #SO<sub>2</sub>/mmBtu, again with a lowering trend. In addition, despite these units obligation to comply with the 1.2 #SO<sub>2</sub>/mmBtu standard under NSPS Subpart D, there appear to have been incentives other than compliance to use coal with much lower sulfur content. Even if the lower rates at these units are necessary to demonstrate compliance with the acid rain cap and trade program, it shows that the coals necessary to achieve these lower emission objectives are readily available and have been for many years.

In 2002, the highest average SO<sub>2</sub> inlet concentration for a single, uncontrolled NSPS unit in Region 7 was 0.81 #SO<sub>2</sub>/mmBtu. This occurred at the Nearman Creek facility in Kansas City, Kansas. Nearman Creek is appropriate for comparison to the City Utilities Southwest Station since both are public power facilities, both have units of a similar size, and both likely face similar constraints when purchasing compliance coal (e.g. low bid contracts, small purchaser). Further, nearly 97% of the emissions data evaluated since 1995 were at or below 0.81 #SO<sub>2</sub>/mmBtu and all emissions data analyzed for uncontrolled NSPS Subpart D utility boilers since 1990, including over 144 utility-years of certified emissions data were below a maximum annual potential SO<sub>2</sub> inlet concentration of 0.92 #SO<sub>2</sub>/mmBtu. Given the long history and utility-wide nature of this information, it is apparent that the baseline value used in the City Utilities Southwest

SO<sub>2</sub> BACT demonstration is not representative of pre-control emissions likely to occur while combusting PRB coal.

We acknowledge that the annualized SO<sub>2</sub> inlet concentrations described above may not tell the whole story. Sulfur in coal can be reasonably variable and can greatly affect short term averages. As averaging periods shrink, variability becomes an important consideration. As averaging periods expand, the effects of variability are minimized. Since BACT emission limitations must be established using shorter term averages, adjustments to the annual average data may be appropriate. To estimate the magnitude of an annual-to-30-day-rolling-average adjustment, we again looked at the monthly variability for the Nearman plant and other public power facilities in Region 7 from 1997 through 2002. During this period, monthly emissions – which are similar to those that might be observed using a 30-day rolling average – showed 97% of the values were less than 0.84 #SO<sub>2</sub>/mmBtu and 99% were less than 0.93 #SO<sub>2</sub>/mmBtu. Two of the 576 months of data analyzed had SO<sub>2</sub> inlet concentrations greater than 1.0 #SO<sub>2</sub>/mmBtu and were clearly outliers. While it is clear that utilities included in the Region 7 analysis have had to periodically use other higher sulfur fuels during times when their preferred fuel supply was unavailable, these infrequent events should not serve as the basis for setting a single BACT standard to represent all periods of operation. In fact, these periods of higher emissions are already reflected in the annual and monthly data analyses described above. Again, this analysis shows that the baseline value used in the City Utilities Southwest SO<sub>2</sub> BACT demonstration may not be representative of pre-control emissions likely to occur while combusting PRB coal.

It is also important to note that when multiple assumptions are used to determine a BACT emission limit they should be evaluated on a consistent time basis. In this case, the BACT limit is derived from applying a 92% removal efficiency to a design sulfur inlet concentration. But, if the 1.462 #SO<sub>2</sub>/mmBtu value presented by City Utilities represents a short-term, peak (e.g. instantaneous or 1-hr) inlet concentration value and the 92% SDA removal efficiency represents performance over an extended period such as a year, then this would result in mixed comparison. Such an apples-to-oranges analysis does not provide a meaningful result. The 92% SDA removal efficiency is likely based on annual performance guarantee and may even have a higher performance results on a shorter-term monthly basis. As suggested above, typical 30-day average, maximum, SO<sub>2</sub> inlet concentrations are well below the baseline value used in the proposed BACT analysis. Considered together on a consistent time basis, these multiple assumptions appear to result in a substantially lower SO<sub>2</sub> BACT limit than proposed in the PSD permit.

We also understand an applicants desire for a margin of compliance when setting BACT. But in this case, establishing SO<sub>2</sub> BACT at 0.12 #SO<sub>2</sub>/mmBtu effectively allows City Utilities to operate the SDA at an efficiency of 79% when burning PRB coal with an average SO<sub>2</sub> inlet concentration of 0.58 #SO<sub>2</sub>/mmBtu and 87% when burning PRB coal with an average SO<sub>2</sub> inlet concentration of 0.93 #SO<sub>2</sub>/mmBtu. These SO<sub>2</sub> inlet

concentrations correspond to the average and worst case monthly average inlet concentrations for all NSPS Subpart D affected public power units in Region 7 between 1997 and 2002. Both percent reduction efficiencies fall well below the long-term design performance anticipated for the SDA as BACT. To compensate for potential under-performance of the SDA when burning lower sulfur PRB coals, we believe the final permit should condition City Utilities to achieve a 92% reduction, based on a 30-day rolling average, in addition to the appropriate BACT emission limitation. To assure that the SDA is operated in a highly effective manner during all periods of operation, the permit should also require City Utilities to install, operate, maintain, and quality assure inlet SO<sub>2</sub> CEMS, in addition to the required stack CEMS, to verify that performance across the SDA is achieved. Since these CEMS are already required by NSPS Subpart Da, it should not be an imposition to include in the permit. We also concur that any additional need for compliance margin has been accounted for in the analysis for lowering SDA performance from 94 to 92%, as described in the supplemental BACT document, and should not be lowered any further.

Lastly, if the department decides not to establish an on-going SDA performance requirement as part of the permit, then we believe that it is essential that the department establish a range of BACT emission limitations for each coal with unique SO<sub>2</sub> inlet concentration characteristics. For example, if City Utilities anticipates they may have to utilize a PRB coal with a 1.462 #SO<sub>2</sub>/mmBtu inlet concentration, then a BACT limit of 0.12 may be appropriate during those limited periods of time. On the other hand, if City utilities combusts PRB with sulfur characteristics more typical of those burned by similar utilities throughout the region, then a SO<sub>2</sub> BACT emission limitation of 0.05 - 0.07 #SO<sub>2</sub>/mmBtu appears to be far more appropriate. Any limit that achieves less than 92% control will likely not be deemed to be BACT. This approach is consistent with the principles contemplated under BACT to establish limits based on individual fuels, assures that the SO<sub>2</sub> controls must be operated to their maximum capabilities at all times, and yet allows City Utilities the flexibility to purchase coal anywhere throughout the PRB region in accordance with their purchasing practices and goals.

As a general note, even though we clearly understand that the proposed City Utilities Southwest project will not be an uncontrolled utility boiler subject to NSPS Subpart D. Nevertheless, the data analyzed for these units are highly informative about the SO<sub>2</sub> inlet potential concentration for units combusting PRB coal and should not be overlooked. If the department would like to continue its investigation of the "baseline" coal issue, we would be glad to share the spreadsheets and analysis that we have already performed as a starting point.

## 2) PM-CEMS

EPA recently promulgated final performance specifications, PS-11, for installation, operation, maintenance, and quality assurance of continuous particulate matter emission monitoring systems. For a number of reasons, we believe that the

proposed City Utilities Southwest Unit 2 installation is a prime location to require the use of this monitoring technology. First, this is a state-of-the-art utility boiler which will benefit from a host of new technology. Since the PSD program is meant to be technology forcing, requiring a PM-CEMS would be consistent with that goal. Second, utilities can emit large amounts of particulate matter when control devices are not functioning correctly. The PC-CEMS is a valuable tool to help enhance baghouse performance while also providing information to verify that the unit is meeting its PM BACT emission limitation. Third, utility companies typically have very experienced instrumentation staff. City Utilities has a lot of experience using monitors under the acid rain program and can extend that knowledge into moving the PM-CEMS technology forward. City Utilities also has the expertise to manage the acquisition, installation, operation of complicated monitoring technology and oversee the critical testing that is essential to the proper functioning of the PM-CEMS. Lastly, utility companies typically have the economic resources to purchase complicated monitoring technologies and the support necessary to ultimately make them work. When all of these critical factors come together, it is an appropriate time to promote the technology. In that regard, we strongly encourage the department to require PM-CEMs for the new Southwest unit.

### 3) Periodic stack testing with baseline and on-going parametric measurements

Condition 2 establishes emission limitations for HF, HCl, and mercury which are verified through an initial, one time stack test required by Condition 6. The limitations for HF and HCl were imposed primarily for the purpose of keeping the proposed project out of 112(g) technology review for hazardous air pollutants. The limit for mercury limit was imposed to keep the project out of BACT review under PSD. Even with the limits on potential to emit, all are at or very close to their respective technology review thresholds. In the case of HCl, the potential to emit presumes a scrubber performance of 96%. If performance drops to 95%, then HCl emissions would be over the 112(g) review threshold and could trigger additional review for all HAPs, including the possibility of add-on controls such as activated carbon injection for mercury. It is imperative, then, that these limits continue to be complied with throughout the lifetime of the project.

While initial stack testing may be appropriate to verify that City Utilities is meeting its HAP limits following initial startup of the boiler, there are no provisions in the permit for verifying on-going compliance with the HCl, HF, and mercury emission limitations. Periodic stack testing may further inform the compliance verification, but it does not assure that the control equipment, in this case the SDA for HCl and HF, continues to perform at the level needed to keep these pollutants out of 112(g) review. Consequently, we recommend that the permit include a condition that requires collection of baseline and ongoing SDA parametric data sufficient to verify that the scrubber continues to operate at the 96% performance level necessary to validate the 112(g) non-applicability assumptions for HCl. If the department is unable to specify which parameters it wants City Utilities to measure, then we recommend inclusion of a condition which requires City Utilities to submit a “parametric measurement and analysis

plan” for approval prior to the first HCl baseline performance test. In addition, we think it is appropriate to place the consequences statement, “In the event that the stack test results [or ongoing parametric data] demonstrate that the potential of any single HAP exceeds 10.0 tons per year or the potential emissions of all HAPs combined exceed 25.0 tons per year, City Utilities will have to submit a case-by-case MACT analysis for the new pulverized coal fired boiler” as a condition in the permit along with the statement already made in the “Review Summary”.

4) Compliance with the mass-based limits in Conditions 2.C. and 2.E.

Conditions 2.C. and 2.E. establish short term NAAQS-based, mass emission limitations for SO<sub>2</sub> and CO. Since City Utilities is already required to install a SO<sub>2</sub> mass measurement system pursuant to the acid rain program, we encourage the department to further condition the permit to require the use of the acid rain CEMS to verify compliance with the short term SO<sub>2</sub> limit. In addition, we encourage the department to also require the use of the flow monitoring system required by the acid rain program in conjunction with the CO concentration CEMS required in Condition 7 to verify compliance with the short term CO mass emission limitation.

5) Monitoring clarification

Condition 10.A. requires City Utilities to conduct post construction monitoring for SO<sub>2</sub> for one year after the unit is fully operational. Following completion of the post-construction monitoring, the department can suspend the monitoring at its option. Since this condition does not make clear that this is “ambient” monitoring, it would be helpful to do so. In the event this condition was intended to also mean “stack” monitoring, we believe that such monitoring should, and under the NSPS and acid rain programs must, continue throughout the life of the unit.

[End of Comments]

Annual SO2 Inlet Rates for NSPS Subpart D Units in Region 7  
(#SO2/mmBtu)

		1980	1985	1990	1995	1996	1997	1998	1999	2000	2001	2002
SO2 Rate	Ames 8		1.12	0.41	0.40	0.42	0.44	0.36	0.36	0.38	0.34	0.36
	CBEC 3	0.68	0.85	0.66	0.76	0.70	0.73	0.80	0.74	0.68	0.65	0.65
	Neal 3	1.13	1.32	0.73	0.83	0.73	0.73	0.72	0.68	0.66	0.72	0.67
	Neal 4	1.13	0.73	0.72	0.71	0.77	0.76	0.77	0.73	0.65	0.71	0.68
	Lansing 4	1.16	0.70	0.67	0.69	0.61	0.58	0.77	0.74	0.66	0.63	0.55
	Louisa 101		0.79	0.75	0.76	0.77	0.75	0.72	0.70	0.64	0.59	0.58
	Ottumwa 1		0.82	0.72	0.71	0.77	0.71	0.72	0.70	0.66	0.65	0.59
	LaCygne 2		0.94	0.83	0.70	0.77	0.75	0.78	0.73	0.68	0.72	0.69
	Nearman 1		0.82	0.75	0.72	0.67	0.67	0.76	0.84	0.72	0.78	0.81
	Iatan 1	0.66	0.77	0.72	0.72	0.72	0.75	0.76	0.74	0.65	0.62	0.61
	GG 1	0.73	0.72	0.73	0.62	0.63	0.47	0.47	0.47	0.52	0.57	0.59
	GG 2		0.73	0.72	0.61	0.62	0.48	0.51	0.47	0.50	0.57	0.57
	Whelan 1		0.91	0.50	0.52	0.68	0.63	0.64	0.72	0.64	0.61	0.67
	Lon Wright	0.72	0.88	0.86	0.92	0.61	0.56	0.58	0.46	0.48	0.49	0.44
	NE City 1	0.80	0.92	0.70	0.79	0.72	0.76	0.53	0.71	0.67	0.68	0.63
	Platte 1		0.98	0.75	0.66	0.65	0.64	0.84	0.72	0.66	0.60	0.62
Weighted Average		0.87	0.83	0.73	0.71	0.71	0.67	0.68	0.67	0.64	0.64	0.62

Monthly SO2 Inlet Rates for Public Power NSPS Subpart D Units in Region 7  
 (#SO2/mmBtu)

STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
IA	Ames	1122	8	1997	JAN	86.7	0.44				
IA	Ames	1122	8	1997	FEB	69	0.44				
IA	Ames	1122	8	1997	MAR	27.7	0.39				
IA	Ames	1122	8	1997	APR	67.8	0.51				
IA	Ames	1122	8	1997	MAY	96.4	0.48				
IA	Ames	1122	8	1997	JUN	71	0.46				
IA	Ames	1122	8	1997	JUL	82.3	0.39				
IA	Ames	1122	8	1997	AUG	82.2	0.43				
IA	Ames	1122	8	1997	SEP	71	0.40				
IA	Ames	1122	8	1997	OCT	78.8	0.44				
IA	Ames	1122	8	1997	NOV	37.2	0.39				
IA	Ames	1122	8	1997	DEC	0		0.44	0.51	0.39	0.08
IA	Ames	1122	8	1998	JAN	6.8	0.36				
IA	Ames	1122	8	1998	FEB	45	0.33				
IA	Ames	1122	8	1998	MAR	75.1	0.35				
IA	Ames	1122	8	1998	APR	39.3	0.34				
IA	Ames	1122	8	1998	MAY	44.9	0.36				
IA	Ames	1122	8	1998	JUN	74.1	0.37				
IA	Ames	1122	8	1998	JUL	83	0.37				
IA	Ames	1122	8	1998	AUG	77.1	0.36				
IA	Ames	1122	8	1998	SEP	52.7	0.40				
IA	Ames	1122	8	1998	OCT	65.8	0.36				
IA	Ames	1122	8	1998	NOV	60.7	0.36				
IA	Ames	1122	8	1998	DEC	70.9	0.35	0.36	0.40	0.33	0.04
IA	Ames	1122	8	1999	JAN	57.9	0.36				
IA	Ames	1122	8	1999	FEB	63.9	0.36				
IA	Ames	1122	8	1999	MAR	52.5	0.34				
IA	Ames	1122	8	1999	APR	81.1	0.37				
IA	Ames	1122	8	1999	MAY	17.8	0.35				
IA	Ames	1122	8	1999	JUN	76.6	0.35				
IA	Ames	1122	8	1999	JUL	85.8	0.36				
IA	Ames	1122	8	1999	AUG	83	0.37				
IA	Ames	1122	8	1999	SEP	68.6	0.35				
IA	Ames	1122	8	1999	OCT	51.4	0.36				
IA	Ames	1122	8	1999	NOV	47.3	0.38				
IA	Ames	1122	8	1999	DEC	86.2	0.38	0.36	0.38	0.34	0.02
IA	Ames	1122	8	2000	JAN	98.9	0.42				
IA	Ames	1122	8	2000	FEB	87.7	0.39				
IA	Ames	1122	8	2000	MAR	92.6	0.36				
IA	Ames	1122	8	2000	APR	19.8	0.38				
IA	Ames	1122	8	2000	MAY	0					
IA	Ames	1122	8	2000	JUN	46	0.38				
IA	Ames	1122	8	2000	JUL	80.8	0.41				
IA	Ames	1122	8	2000	AUG	78.5	0.37				
IA	Ames	1122	8	2000	SEP	76.1	0.37				
IA	Ames	1122	8	2000	OCT	68.3	0.34				
IA	Ames	1122	8	2000	NOV	0					
IA	Ames	1122	8	2000	DEC	6.9	0.32	0.38	0.42	0.32	0.06
IA	Ames	1122	8	2001	JAN	75.5	0.36				
IA	Ames	1122	8	2001	FEB	75.8	0.33				
IA	Ames	1122	8	2001	MAR	92.6	0.36				
IA	Ames	1122	8	2001	APR	76.8	0.35				
IA	Ames	1122	8	2001	MAY	77.7	0.33				
IA	Ames	1122	8	2001	JUN	47	0.32				
IA	Ames	1122	8	2001	JUL	65.6	0.35				
IA	Ames	1122	8	2001	AUG	65.9	0.34				
IA	Ames	1122	8	2001	SEP	67.7	0.33				
IA	Ames	1122	8	2001	OCT	71.8	0.36				
IA	Ames	1122	8	2001	NOV	42.7	0.34				
IA	Ames	1122	8	2001	DEC	26.4	0.33	0.34	0.36	0.32	0.02
IA	Ames	1122	8	2002	JAN	71.9	0.34				
IA	Ames	1122	8	2002	FEB	63.2	0.35				
IA	Ames	1122	8	2002	MAR	64.4	0.37				
IA	Ames	1122	8	2002	APR	75.4	0.37				
IA	Ames	1122	8	2002	MAY	61.5	0.38				
IA	Ames	1122	8	2002	JUN	75.7	0.37				
IA	Ames	1122	8	2002	JUL	74.1	0.38				
IA	Ames	1122	8	2002	AUG	74	0.36				
IA	Ames	1122	8	2002	SEP	71.5	0.35				
IA	Ames	1122	8	2002	OCT	64.6	0.34				
IA	Ames	1122	8	2002	NOV	61.8	0.34				
IA	Ames	1122	8	2002	DEC	71.2	0.34	0.36	0.38	0.34	0.02

Monthly SO2 Inlet Rates for Public Power NSPS Subpart D Units in Region 7  
 (#SO2/mmBtu)

STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
NE	Gerald Gentleman Station	6077	1	1997	JAN	1185.7	0.50				
NE	Gerald Gentleman Station	6077	1	1997	FEB	1041.5	0.45				
NE	Gerald Gentleman Station	6077	1	1997	MAR	848.6	0.42				
NE	Gerald Gentleman Station	6077	1	1997	APR	1121.6	0.45				
NE	Gerald Gentleman Station	6077	1	1997	MAY	921.9	0.45				
NE	Gerald Gentleman Station	6077	1	1997	JUN	1021.9	0.48				
NE	Gerald Gentleman Station	6077	1	1997	JUL	988.8	0.47				
NE	Gerald Gentleman Station	6077	1	1997	AUG	886.2	0.48				
NE	Gerald Gentleman Station	6077	1	1997	SEP	979.1	0.50				
NE	Gerald Gentleman Station	6077	1	1997	OCT	855.8	0.47				
NE	Gerald Gentleman Station	6077	1	1997	NOV	956.6	0.47				
NE	Gerald Gentleman Station	6077	1	1997	DEC	835.6	0.46	0.47	0.50	0.42	0.05
NE	Gerald Gentleman Station	6077	1	1998	JAN	802.5	0.45				
NE	Gerald Gentleman Station	6077	1	1998	FEB	974.5	0.49				
NE	Gerald Gentleman Station	6077	1	1998	MAR	646.1	0.45				
NE	Gerald Gentleman Station	6077	1	1998	APR	870	0.50				
NE	Gerald Gentleman Station	6077	1	1998	MAY	860.7	0.43				
NE	Gerald Gentleman Station	6077	1	1998	JUN	998	0.46				
NE	Gerald Gentleman Station	6077	1	1998	JUL	886.6	0.44				
NE	Gerald Gentleman Station	6077	1	1998	AUG	1139.6	0.51				
NE	Gerald Gentleman Station	6077	1	1998	SEP	884.7	0.46				
NE	Gerald Gentleman Station	6077	1	1998	OCT	1168.2	0.50				
NE	Gerald Gentleman Station	6077	1	1998	NOV	960.1	0.47				
NE	Gerald Gentleman Station	6077	1	1998	DEC	975.8	0.44	0.47	0.51	0.43	0.05
NE	Gerald Gentleman Station	6077	1	1999	JAN	934.2	0.47				
NE	Gerald Gentleman Station	6077	1	1999	FEB	872.1	0.43				
NE	Gerald Gentleman Station	6077	1	1999	MAR	134.6	0.36				
NE	Gerald Gentleman Station	6077	1	1999	APR	797.1	0.40				
NE	Gerald Gentleman Station	6077	1	1999	MAY	814	0.40				
NE	Gerald Gentleman Station	6077	1	1999	JUN	929.6	0.47				
NE	Gerald Gentleman Station	6077	1	1999	JUL	1189.6	0.49				
NE	Gerald Gentleman Station	6077	1	1999	AUG	1087.9	0.48				
NE	Gerald Gentleman Station	6077	1	1999	SEP	800.1	0.44				
NE	Gerald Gentleman Station	6077	1	1999	OCT	1056.3	0.54				
NE	Gerald Gentleman Station	6077	1	1999	NOV	1074.6	0.57				
NE	Gerald Gentleman Station	6077	1	1999	DEC	1008	0.49	0.47	0.57	0.36	0.11
NE	Gerald Gentleman Station	6077	1	2000	JAN	989.1	0.56				
NE	Gerald Gentleman Station	6077	1	2000	FEB	965.2	0.55				
NE	Gerald Gentleman Station	6077	1	2000	MAR	1129.8	0.53				
NE	Gerald Gentleman Station	6077	1	2000	APR	945.4	0.54				
NE	Gerald Gentleman Station	6077	1	2000	MAY	1059.6	0.52				
NE	Gerald Gentleman Station	6077	1	2000	JUN	916.7	0.54				
NE	Gerald Gentleman Station	6077	1	2000	JUL	851.8	0.42				
NE	Gerald Gentleman Station	6077	1	2000	AUG	1029.9	0.50				
NE	Gerald Gentleman Station	6077	1	2000	SEP	402.5	0.47				
NE	Gerald Gentleman Station	6077	1	2000	OCT	0					
NE	Gerald Gentleman Station	6077	1	2000	NOV	0.3	0.02				
NE	Gerald Gentleman Station	6077	1	2000	DEC	1313.3	0.56	0.52	0.56	0.02	0.50
NE	Gerald Gentleman Station	6077	1	2001	JAN	1538.1	0.56				
NE	Gerald Gentleman Station	6077	1	2001	FEB	1392.7	0.55				
NE	Gerald Gentleman Station	6077	1	2001	MAR	1542.8	0.56				
NE	Gerald Gentleman Station	6077	1	2001	APR	1421.1	0.54				
NE	Gerald Gentleman Station	6077	1	2001	MAY	1441.6	0.56				
NE	Gerald Gentleman Station	6077	1	2001	JUN	1391.2	0.58				
NE	Gerald Gentleman Station	6077	1	2001	JUL	1423.3	0.54				
NE	Gerald Gentleman Station	6077	1	2001	AUG	1455.6	0.58				
NE	Gerald Gentleman Station	6077	1	2001	SEP	1271.2	0.58				
NE	Gerald Gentleman Station	6077	1	2001	OCT	966.6	0.66				
NE	Gerald Gentleman Station	6077	1	2001	NOV	1412	0.59				
NE	Gerald Gentleman Station	6077	1	2001	DEC	1437.9	0.56	0.57	0.66	0.54	0.09
NE	Gerald Gentleman Station	6077	1	2002	JAN	1526.1	0.60				
NE	Gerald Gentleman Station	6077	1	2002	FEB	1414	0.62				
NE	Gerald Gentleman Station	6077	1	2002	MAR	1531.2	0.60				
NE	Gerald Gentleman Station	6077	1	2002	APR	1494.6	0.61				
NE	Gerald Gentleman Station	6077	1	2002	MAY	1398.3	0.60				
NE	Gerald Gentleman Station	6077	1	2002	JUN	1408.4	0.60				
NE	Gerald Gentleman Station	6077	1	2002	JUL	1485.6	0.57				
NE	Gerald Gentleman Station	6077	1	2002	AUG	1358.9	0.55				
NE	Gerald Gentleman Station	6077	1	2002	SEP	942.3	0.59				
NE	Gerald Gentleman Station	6077	1	2002	OCT	512.1	0.59				
NE	Gerald Gentleman Station	6077	1	2002	NOV	1343.7	0.58				
NE	Gerald Gentleman Station	6077	1	2002	DEC	1265.6	0.56	0.59	0.62	0.55	0.04

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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
NE	Gerald Gentleman Station	6077	2	1997	JAN	1043.6	0.46				
NE	Gerald Gentleman Station	6077	2	1997	FEB	760.7	0.46				
NE	Gerald Gentleman Station	6077	2	1997	MAR	929.9	0.43				
NE	Gerald Gentleman Station	6077	2	1997	APR	973.6	0.44				
NE	Gerald Gentleman Station	6077	2	1997	MAY	752.2	0.47				
NE	Gerald Gentleman Station	6077	2	1997	JUN	741	0.46				
NE	Gerald Gentleman Station	6077	2	1997	JUL	1056	0.46				
NE	Gerald Gentleman Station	6077	2	1997	AUG	908.8	0.46				
NE	Gerald Gentleman Station	6077	2	1997	SEP	818.7	0.51				
NE	Gerald Gentleman Station	6077	2	1997	OCT	995.2	0.56				
NE	Gerald Gentleman Station	6077	2	1997	NOV	1120.7	0.54				
NE	Gerald Gentleman Station	6077	2	1997	DEC	1136.9	0.50	0.48	0.56	0.43	0.08
NE	Gerald Gentleman Station	6077	2	1998	JAN	928	0.46				
NE	Gerald Gentleman Station	6077	2	1998	FEB	959.3	0.49				
NE	Gerald Gentleman Station	6077	2	1998	MAR	945.6	0.51				
NE	Gerald Gentleman Station	6077	2	1998	APR	935.4	0.53				
NE	Gerald Gentleman Station	6077	2	1998	MAY	1096.2	0.51				
NE	Gerald Gentleman Station	6077	2	1998	JUN	939.9	0.52				
NE	Gerald Gentleman Station	6077	2	1998	JUL	1089.8	0.51				
NE	Gerald Gentleman Station	6077	2	1998	AUG	1064	0.56				
NE	Gerald Gentleman Station	6077	2	1998	SEP	589.6	0.50				
NE	Gerald Gentleman Station	6077	2	1998	OCT	1069.2	0.50				
NE	Gerald Gentleman Station	6077	2	1998	NOV	1128.7	0.53				
NE	Gerald Gentleman Station	6077	2	1998	DEC	1171.1	0.49	0.51	0.56	0.46	0.05
NE	Gerald Gentleman Station	6077	2	1999	JAN	1070.2	0.48				
NE	Gerald Gentleman Station	6077	2	1999	FEB	890.5	0.43				
NE	Gerald Gentleman Station	6077	2	1999	MAR	1197.3	0.50				
NE	Gerald Gentleman Station	6077	2	1999	APR	65	0.45				
NE	Gerald Gentleman Station	6077	2	1999	MAY	363	0.41				
NE	Gerald Gentleman Station	6077	2	1999	JUN	985.2	0.51				
NE	Gerald Gentleman Station	6077	2	1999	JUL	1235.4	0.49				
NE	Gerald Gentleman Station	6077	2	1999	AUG	1081.9	0.46				
NE	Gerald Gentleman Station	6077	2	1999	SEP	796.5	0.44				
NE	Gerald Gentleman Station	6077	2	1999	OCT	1019	0.45				
NE	Gerald Gentleman Station	6077	2	1999	NOV	1016.8	0.46				
NE	Gerald Gentleman Station	6077	2	1999	DEC	1084.6	0.46	0.47	0.51	0.41	0.05
NE	Gerald Gentleman Station	6077	2	2000	JAN	1231	0.52				
NE	Gerald Gentleman Station	6077	2	2000	FEB	903	0.48				
NE	Gerald Gentleman Station	6077	2	2000	MAR	1366.7	0.57				
NE	Gerald Gentleman Station	6077	2	2000	APR	1308.4	0.57				
NE	Gerald Gentleman Station	6077	2	2000	MAY	1240.6	0.52				
NE	Gerald Gentleman Station	6077	2	2000	JUN	851.9	0.49				
NE	Gerald Gentleman Station	6077	2	2000	JUL	1202.5	0.49				
NE	Gerald Gentleman Station	6077	2	2000	AUG	1220.3	0.50				
NE	Gerald Gentleman Station	6077	2	2000	SEP	944.6	0.50				
NE	Gerald Gentleman Station	6077	2	2000	OCT	1198.5	0.52				
NE	Gerald Gentleman Station	6077	2	2000	NOV	899.5	0.40				
NE	Gerald Gentleman Station	6077	2	2000	DEC	621.2	0.34	0.50	0.57	0.34	0.16
NE	Gerald Gentleman Station	6077	2	2001	JAN	1343.2	0.55				
NE	Gerald Gentleman Station	6077	2	2001	FEB	1075.3	0.57				
NE	Gerald Gentleman Station	6077	2	2001	MAR	1391.6	0.60				
NE	Gerald Gentleman Station	6077	2	2001	APR	0					
NE	Gerald Gentleman Station	6077	2	2001	MAY	855.7	0.56				
NE	Gerald Gentleman Station	6077	2	2001	JUN	1281.4	0.57				
NE	Gerald Gentleman Station	6077	2	2001	JUL	1348.9	0.52				
NE	Gerald Gentleman Station	6077	2	2001	AUG	1465.4	0.56				
NE	Gerald Gentleman Station	6077	2	2001	SEP	1371	0.58				
NE	Gerald Gentleman Station	6077	2	2001	OCT	1532.4	0.61				
NE	Gerald Gentleman Station	6077	2	2001	NOV	1431.1	0.59				
NE	Gerald Gentleman Station	6077	2	2001	DEC	1507.1	0.58	0.57	0.61	0.52	0.06
NE	Gerald Gentleman Station	6077	2	2002	JAN	1548.6	0.60				
NE	Gerald Gentleman Station	6077	2	2002	FEB	1399	0.61				
NE	Gerald Gentleman Station	6077	2	2002	MAR	1532.2	0.59				
NE	Gerald Gentleman Station	6077	2	2002	APR	1449.4	0.59				
NE	Gerald Gentleman Station	6077	2	2002	MAY	680.5	0.59				
NE	Gerald Gentleman Station	6077	2	2002	JUN	1382.9	0.59				
NE	Gerald Gentleman Station	6077	2	2002	JUL	1496.9	0.56				
NE	Gerald Gentleman Station	6077	2	2002	AUG	1373.5	0.55				
NE	Gerald Gentleman Station	6077	2	2002	SEP	1348.2	0.54				
NE	Gerald Gentleman Station	6077	2	2002	OCT	1371.6	0.53				
NE	Gerald Gentleman Station	6077	2	2002	NOV	1435.3	0.55				
NE	Gerald Gentleman Station	6077	2	2002	DEC	1453.1	0.54	0.57	0.61	0.53	0.04

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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
NE	Gerald Whelan Energy Center	60	1	1997	JAN	167.8	0.56				
NE	Gerald Whelan Energy Center	60	1	1997	FEB	143.4	0.54				
NE	Gerald Whelan Energy Center	60	1	1997	MAR	64.8	0.56				
NE	Gerald Whelan Energy Center	60	1	1997	APR	0.3	2.05				
NE	Gerald Whelan Energy Center	60	1	1997	MAY	100.7	0.50				
NE	Gerald Whelan Energy Center	60	1	1997	JUN	159	0.65				
NE	Gerald Whelan Energy Center	60	1	1997	JUL	198	0.64				
NE	Gerald Whelan Energy Center	60	1	1997	AUG	193.8	0.68				
NE	Gerald Whelan Energy Center	60	1	1997	SEP	160.2	0.59				
NE	Gerald Whelan Energy Center	60	1	1997	OCT	158.6	0.66				
NE	Gerald Whelan Energy Center	60	1	1997	NOV	171.8	0.75				
NE	Gerald Whelan Energy Center	60	1	1997	DEC	181.3	0.76	0.63	2.05	0.50	1.42
NE	Gerald Whelan Energy Center	60	1	1998	JAN	159.2	0.69				
NE	Gerald Whelan Energy Center	60	1	1998	FEB	81.1	0.38				
NE	Gerald Whelan Energy Center	60	1	1998	MAR	96.7	0.42				
NE	Gerald Whelan Energy Center	60	1	1998	APR	42	0.43				
NE	Gerald Whelan Energy Center	60	1	1998	MAY	144.2	0.53				
NE	Gerald Whelan Energy Center	60	1	1998	JUN	203.4	0.71				
NE	Gerald Whelan Energy Center	60	1	1998	JUL	211.1	0.67				
NE	Gerald Whelan Energy Center	60	1	1998	AUG	217.3	0.71				
NE	Gerald Whelan Energy Center	60	1	1998	SEP	222.1	0.76				
NE	Gerald Whelan Energy Center	60	1	1998	OCT	160.9	0.68				
NE	Gerald Whelan Energy Center	60	1	1998	NOV	178.7	0.74				
NE	Gerald Whelan Energy Center	60	1	1998	DEC	177.7	0.70	0.64	0.76	0.38	0.25
NE	Gerald Whelan Energy Center	60	1	1999	JAN	198.4	0.73				
NE	Gerald Whelan Energy Center	60	1	1999	FEB	179.4	0.71				
NE	Gerald Whelan Energy Center	60	1	1999	MAR	155.7	0.74				
NE	Gerald Whelan Energy Center	60	1	1999	APR	40.6	0.73				
NE	Gerald Whelan Energy Center	60	1	1999	MAY	207	0.74				
NE	Gerald Whelan Energy Center	60	1	1999	JUN	228.5	0.73				
NE	Gerald Whelan Energy Center	60	1	1999	JUL	254.2	0.74				
NE	Gerald Whelan Energy Center	60	1	1999	AUG	230.5	0.72				
NE	Gerald Whelan Energy Center	60	1	1999	SEP	193.9	0.72				
NE	Gerald Whelan Energy Center	60	1	1999	OCT	153.9	0.70				
NE	Gerald Whelan Energy Center	60	1	1999	NOV	197.2	0.71				
NE	Gerald Whelan Energy Center	60	1	1999	DEC	212	0.71	0.72	0.74	0.70	0.02
NE	Gerald Whelan Energy Center	60	1	2000	JAN	206.9	0.69				
NE	Gerald Whelan Energy Center	60	1	2000	FEB	201.2	0.70				
NE	Gerald Whelan Energy Center	60	1	2000	MAR	212.7	0.68				
NE	Gerald Whelan Energy Center	60	1	2000	APR	55.7	0.69				
NE	Gerald Whelan Energy Center	60	1	2000	MAY	194.7	0.64				
NE	Gerald Whelan Energy Center	60	1	2000	JUN	191.6	0.64				
NE	Gerald Whelan Energy Center	60	1	2000	JUL	208.1	0.64				
NE	Gerald Whelan Energy Center	60	1	2000	AUG	179	0.55				
NE	Gerald Whelan Energy Center	60	1	2000	SEP	167	0.58				
NE	Gerald Whelan Energy Center	60	1	2000	OCT	154.6	0.63				
NE	Gerald Whelan Energy Center	60	1	2000	NOV	182.3	0.62				
NE	Gerald Whelan Energy Center	60	1	2000	DEC	209.6	0.67	0.64	0.70	0.55	0.09
NE	Gerald Whelan Energy Center	60	1	2001	JAN	190.4	0.62				
NE	Gerald Whelan Energy Center	60	1	2001	FEB	176.4	0.64				
NE	Gerald Whelan Energy Center	60	1	2001	MAR	186.7	0.64				
NE	Gerald Whelan Energy Center	60	1	2001	APR	110	0.55				
NE	Gerald Whelan Energy Center	60	1	2001	MAY	149.2	0.61				
NE	Gerald Whelan Energy Center	60	1	2001	JUN	147.7	0.59				
NE	Gerald Whelan Energy Center	60	1	2001	JUL	178.9	0.54				
NE	Gerald Whelan Energy Center	60	1	2001	AUG	221.5	0.70				
NE	Gerald Whelan Energy Center	60	1	2001	SEP	156.2	0.55				
NE	Gerald Whelan Energy Center	60	1	2001	OCT	153.3	0.63				
NE	Gerald Whelan Energy Center	60	1	2001	NOV	175.3	0.62				
NE	Gerald Whelan Energy Center	60	1	2001	DEC	162.2	0.57	0.61	0.70	0.54	0.10
NE	Gerald Whelan Energy Center	60	1	2002	JAN	159.4	0.56				
NE	Gerald Whelan Energy Center	60	1	2002	FEB	144.8	0.55				
NE	Gerald Whelan Energy Center	60	1	2002	MAR	75.8	0.52				
NE	Gerald Whelan Energy Center	60	1	2002	APR	27	0.61				
NE	Gerald Whelan Energy Center	60	1	2002	MAY	203.4	0.71				
NE	Gerald Whelan Energy Center	60	1	2002	JUN	213.2	0.69				
NE	Gerald Whelan Energy Center	60	1	2002	JUL	241.3	0.75				
NE	Gerald Whelan Energy Center	60	1	2002	AUG	200.9	0.67				
NE	Gerald Whelan Energy Center	60	1	2002	SEP	131.1	0.72				
NE	Gerald Whelan Energy Center	60	1	2002	OCT	182	0.63				
NE	Gerald Whelan Energy Center	60	1	2002	NOV	201.3	0.69				
NE	Gerald Whelan Energy Center	60	1	2002	DEC	226.8	0.77	0.67	0.77	0.52	0.14

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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
NE	Lon D Wright Power Plant	2240	8	1997	JAN	95.3	0.56				
NE	Lon D Wright Power Plant	2240	8	1997	FEB	100.7	0.61				
NE	Lon D Wright Power Plant	2240	8	1997	MAR	17.9	0.61				
NE	Lon D Wright Power Plant	2240	8	1997	APR	0					
NE	Lon D Wright Power Plant	2240	8	1997	MAY	7.3	0.53				
NE	Lon D Wright Power Plant	2240	8	1997	JUN	113.4	0.57				
NE	Lon D Wright Power Plant	2240	8	1997	JUL	140.4	0.62				
NE	Lon D Wright Power Plant	2240	8	1997	AUG	127.1	0.56				
NE	Lon D Wright Power Plant	2240	8	1997	SEP	131.3	0.52				
NE	Lon D Wright Power Plant	2240	8	1997	OCT	142.6	0.56				
NE	Lon D Wright Power Plant	2240	8	1997	NOV	108.7	0.52				
NE	Lon D Wright Power Plant	2240	8	1997	DEC	101	0.52	0.56	0.62	0.52	0.06
NE	Lon D Wright Power Plant	2240	8	1998	JAN	60.2	0.52				
NE	Lon D Wright Power Plant	2240	8	1998	FEB	89.5	0.52				
NE	Lon D Wright Power Plant	2240	8	1998	MAR	48.6	0.53				
NE	Lon D Wright Power Plant	2240	8	1998	APR	5.2	0.57				
NE	Lon D Wright Power Plant	2240	8	1998	MAY	123.8	0.59				
NE	Lon D Wright Power Plant	2240	8	1998	JUN	112	0.57				
NE	Lon D Wright Power Plant	2240	8	1998	JUL	154.1	0.57				
NE	Lon D Wright Power Plant	2240	8	1998	AUG	149.7	0.66				
NE	Lon D Wright Power Plant	2240	8	1998	SEP	108.1	0.62				
NE	Lon D Wright Power Plant	2240	8	1998	OCT	0					
NE	Lon D Wright Power Plant	2240	8	1998	NOV	0					
NE	Lon D Wright Power Plant	2240	8	1998	DEC	76.4	0.53	0.58	0.66	0.52	0.08
NE	Lon D Wright Power Plant	2240	8	1999	JAN	120	0.58				
NE	Lon D Wright Power Plant	2240	8	1999	FEB	103.8	0.59				
NE	Lon D Wright Power Plant	2240	8	1999	MAR	85.6	0.59				
NE	Lon D Wright Power Plant	2240	8	1999	APR	19.7	0.39				
NE	Lon D Wright Power Plant	2240	8	1999	MAY	76.8	0.41				
NE	Lon D Wright Power Plant	2240	8	1999	JUN	94.8	0.41				
NE	Lon D Wright Power Plant	2240	8	1999	JUL	113.6	0.40				
NE	Lon D Wright Power Plant	2240	8	1999	AUG	106.5	0.42				
NE	Lon D Wright Power Plant	2240	8	1999	SEP	82.5	0.45				
NE	Lon D Wright Power Plant	2240	8	1999	OCT	24.9	0.42				
NE	Lon D Wright Power Plant	2240	8	1999	NOV	74.8	0.43				
NE	Lon D Wright Power Plant	2240	8	1999	DEC	84.2	0.44	0.46	0.59	0.39	0.13
NE	Lon D Wright Power Plant	2240	8	2000	JAN	1.6	0.39				
NE	Lon D Wright Power Plant	2240	8	2000	FEB	0					
NE	Lon D Wright Power Plant	2240	8	2000	MAR	0					
NE	Lon D Wright Power Plant	2240	8	2000	APR	47.4	0.43				
NE	Lon D Wright Power Plant	2240	8	2000	MAY	104.6	0.51				
NE	Lon D Wright Power Plant	2240	8	2000	JUN	90.1	0.50				
NE	Lon D Wright Power Plant	2240	8	2000	JUL	130.4	0.60				
NE	Lon D Wright Power Plant	2240	8	2000	AUG	96.9	0.39				
NE	Lon D Wright Power Plant	2240	8	2000	SEP	73.9	0.38				
NE	Lon D Wright Power Plant	2240	8	2000	OCT	76	0.38				
NE	Lon D Wright Power Plant	2240	8	2000	NOV	82.5	0.53				
NE	Lon D Wright Power Plant	2240	8	2000	DEC	137.9	0.58	0.48	0.60	0.38	0.12
NE	Lon D Wright Power Plant	2240	8	2001	JAN	103.1	0.52				
NE	Lon D Wright Power Plant	2240	8	2001	FEB	114.6	0.56				
NE	Lon D Wright Power Plant	2240	8	2001	MAR	127.7	0.51				
NE	Lon D Wright Power Plant	2240	8	2001	APR	115.7	0.52				
NE	Lon D Wright Power Plant	2240	8	2001	MAY	4.2	0.29				
NE	Lon D Wright Power Plant	2240	8	2001	JUN	132.8	0.56				
NE	Lon D Wright Power Plant	2240	8	2001	JUL	128.3	0.51				
NE	Lon D Wright Power Plant	2240	8	2001	AUG	138.2	0.48				
NE	Lon D Wright Power Plant	2240	8	2001	SEP	87.2	0.44				
NE	Lon D Wright Power Plant	2240	8	2001	OCT	0					
NE	Lon D Wright Power Plant	2240	8	2001	NOV	59.3	0.35				
NE	Lon D Wright Power Plant	2240	8	2001	DEC	77	0.38	0.49	0.56	0.29	0.20
NE	Lon D Wright Power Plant	2240	8	2002	JAN	77.5	0.37				
NE	Lon D Wright Power Plant	2240	8	2002	FEB	30.4	0.40				
NE	Lon D Wright Power Plant	2240	8	2002	MAR	75.3	0.38				
NE	Lon D Wright Power Plant	2240	8	2002	APR	96.2	0.40				
NE	Lon D Wright Power Plant	2240	8	2002	MAY	96.3	0.45				
NE	Lon D Wright Power Plant	2240	8	2002	JUN	121.6	0.48				
NE	Lon D Wright Power Plant	2240	8	2002	JUL	118.4	0.47				
NE	Lon D Wright Power Plant	2240	8	2002	AUG	111.4	0.46				
NE	Lon D Wright Power Plant	2240	8	2002	SEP	79	0.53				
NE	Lon D Wright Power Plant	2240	8	2002	OCT	0					
NE	Lon D Wright Power Plant	2240	8	2002	NOV	86.6	0.48				
NE	Lon D Wright Power Plant	2240	8	2002	DEC	85.1	0.38	0.44	0.53	0.37	0.09

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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
KS	Nearman Creek	6064	N1	1997	JAN	516.6	0.65				
KS	Nearman Creek	6064	N1	1997	FEB	464.2	0.64				
KS	Nearman Creek	6064	N1	1997	MAR	425.8	0.63				
KS	Nearman Creek	6064	N1	1997	APR	605.5	0.68				
KS	Nearman Creek	6064	N1	1997	MAY	311	0.74				
KS	Nearman Creek	6064	N1	1997	JUN	588.6	0.67				
KS	Nearman Creek	6064	N1	1997	JUL	587.3	0.63				
KS	Nearman Creek	6064	N1	1997	AUG	526.5	0.52				
KS	Nearman Creek	6064	N1	1997	SEP	683.3	0.74				
KS	Nearman Creek	6064	N1	1997	OCT	664.3	0.76				
KS	Nearman Creek	6064	N1	1997	NOV	611.2	0.75				
KS	Nearman Creek	6064	N1	1997	DEC	636.1	0.70	0.67	0.76	0.52	0.15
KS	Nearman Creek	6064	N1	1998	JAN	581.9	0.70				
KS	Nearman Creek	6064	N1	1998	FEB	639.2	0.75				
KS	Nearman Creek	6064	N1	1998	MAR	662.1	0.71				
KS	Nearman Creek	6064	N1	1998	APR	783.3	0.81				
KS	Nearman Creek	6064	N1	1998	MAY	313.2	0.81				
KS	Nearman Creek	6064	N1	1998	JUN	714.2	0.77				
KS	Nearman Creek	6064	N1	1998	JUL	761	0.76				
KS	Nearman Creek	6064	N1	1998	AUG	480.4	0.72				
KS	Nearman Creek	6064	N1	1998	SEP	732.5	0.79				
KS	Nearman Creek	6064	N1	1998	OCT	659.2	0.82				
KS	Nearman Creek	6064	N1	1998	NOV	723.1	0.77				
KS	Nearman Creek	6064	N1	1998	DEC	689.2	0.75	0.76	0.82	0.70	0.06
KS	Nearman Creek	6064	N1	1999	JAN	742.7	0.82				
KS	Nearman Creek	6064	N1	1999	FEB	668.3	0.84				
KS	Nearman Creek	6064	N1	1999	MAR	633.4	0.84				
KS	Nearman Creek	6064	N1	1999	APR	0					
KS	Nearman Creek	6064	N1	1999	MAY	386.6	1.25				
KS	Nearman Creek	6064	N1	1999	JUN	648.3	0.88				
KS	Nearman Creek	6064	N1	1999	JUL	500.4	0.89				
KS	Nearman Creek	6064	N1	1999	AUG	406.7	0.96				
KS	Nearman Creek	6064	N1	1999	SEP	335.1	0.80				
KS	Nearman Creek	6064	N1	1999	OCT	680.3	0.78				
KS	Nearman Creek	6064	N1	1999	NOV	662.3	0.78				
KS	Nearman Creek	6064	N1	1999	DEC	690.5	0.77	0.84	1.25	0.77	0.41
KS	Nearman Creek	6064	N1	2000	JAN	545.2	0.73				
KS	Nearman Creek	6064	N1	2000	FEB	393	0.66				
KS	Nearman Creek	6064	N1	2000	MAR	597.4	0.72				
KS	Nearman Creek	6064	N1	2000	APR	664.2	0.66				
KS	Nearman Creek	6064	N1	2000	MAY	351.1	0.68				
KS	Nearman Creek	6064	N1	2000	JUN	680.8	0.70				
KS	Nearman Creek	6064	N1	2000	JUL	763.1	0.72				
KS	Nearman Creek	6064	N1	2000	AUG	805.7	0.74				
KS	Nearman Creek	6064	N1	2000	SEP	753.8	0.76				
KS	Nearman Creek	6064	N1	2000	OCT	791.5	0.78				
KS	Nearman Creek	6064	N1	2000	NOV	739.2	0.78				
KS	Nearman Creek	6064	N1	2000	DEC	510.8	0.70	0.72	0.78	0.66	0.06
KS	Nearman Creek	6064	N1	2001	JAN	801.9	0.75				
KS	Nearman Creek	6064	N1	2001	FEB	654.4	0.78				
KS	Nearman Creek	6064	N1	2001	MAR	804.2	0.74				
KS	Nearman Creek	6064	N1	2001	APR	740	0.76				
KS	Nearman Creek	6064	N1	2001	MAY	414.9	0.73				
KS	Nearman Creek	6064	N1	2001	JUN	689.1	0.74				
KS	Nearman Creek	6064	N1	2001	JUL	721.2	0.78				
KS	Nearman Creek	6064	N1	2001	AUG	708.1	0.79				
KS	Nearman Creek	6064	N1	2001	SEP	764.4	0.82				
KS	Nearman Creek	6064	N1	2001	OCT	591.7	0.80				
KS	Nearman Creek	6064	N1	2001	NOV	714.7	0.82				
KS	Nearman Creek	6064	N1	2001	DEC	783.5	0.84	0.78	0.84	0.73	0.06
KS	Nearman Creek	6064	N1	2002	JAN	761.9	0.79				
KS	Nearman Creek	6064	N1	2002	FEB	670.7	0.86				
KS	Nearman Creek	6064	N1	2002	MAR	704.1	0.80				
KS	Nearman Creek	6064	N1	2002	APR	229.2	0.77				
KS	Nearman Creek	6064	N1	2002	MAY	735.5	0.82				
KS	Nearman Creek	6064	N1	2002	JUN	708.2	0.82				
KS	Nearman Creek	6064	N1	2002	JUL	742.4	0.81				
KS	Nearman Creek	6064	N1	2002	AUG	741	0.82				
KS	Nearman Creek	6064	N1	2002	SEP	701.7	0.80				
KS	Nearman Creek	6064	N1	2002	OCT	721.6	0.81				
KS	Nearman Creek	6064	N1	2002	NOV	179.4	0.78				
KS	Nearman Creek	6064	N1	2002	DEC	729.3	0.82	0.81	0.86	0.77	0.05

Monthly SO2 Inlet Rates for Public Power NSPS Subpart D Units in Region 7  
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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
NE	Nebraska City	6096	1	1997	JAN	1442.1	0.73				
NE	Nebraska City	6096	1	1997	FEB	1481.7	0.87				
NE	Nebraska City	6096	1	1997	MAR	1575.4	0.92				
NE	Nebraska City	6096	1	1997	APR	1986.3	0.98				
NE	Nebraska City	6096	1	1997	MAY	1444.5	0.81				
NE	Nebraska City	6096	1	1997	JUN	1187.1	0.70				
NE	Nebraska City	6096	1	1997	JUL	1207.4	0.66				
NE	Nebraska City	6096	1	1997	AUG	976.9	0.55				
NE	Nebraska City	6096	1	1997	SEP	376.2	0.57				
NE	Nebraska City	6096	1	1997	OCT	0					
NE	Nebraska City	6096	1	1997	NOV	13.6	0.44				
NE	Nebraska City	6096	1	1997	DEC	541.2	0.57	0.76	0.98	0.44	0.32
NE	Nebraska City	6096	1	1998	JAN	1000.9	0.60				
NE	Nebraska City	6096	1	1998	FEB	972.5	0.68				
NE	Nebraska City	6096	1	1998	MAR	1625.7	0.67				
NE	Nebraska City	6096	1	1998	APR	1579.8	0.69				
NE	Nebraska City	6096	1	1998	MAY	1463.3	0.64				
NE	Nebraska City	6096	1	1998	JUN	573.4	0.46				
NE	Nebraska City	6096	1	1998	JUL	937.2	0.44				
NE	Nebraska City	6096	1	1998	AUG	996	0.46				
NE	Nebraska City	6096	1	1998	SEP	929.1	0.49				
NE	Nebraska City	6096	1	1998	OCT	830.3	0.40				
NE	Nebraska City	6096	1	1998	NOV	865.1	0.39				
NE	Nebraska City	6096	1	1998	DEC	1058.7	0.45	0.53	0.69	0.39	0.16
NE	Nebraska City	6096	1	1999	JAN	917.7	0.52				
NE	Nebraska City	6096	1	1999	FEB	0					
NE	Nebraska City	6096	1	1999	MAR	1489.6	0.70				
NE	Nebraska City	6096	1	1999	APR	1861.4	0.75				
NE	Nebraska City	6096	1	1999	MAY	1914.1	0.75				
NE	Nebraska City	6096	1	1999	JUN	1116.6	0.72				
NE	Nebraska City	6096	1	1999	JUL	1832.4	0.72				
NE	Nebraska City	6096	1	1999	AUG	1618.2	0.71				
NE	Nebraska City	6096	1	1999	SEP	1509.3	0.69				
NE	Nebraska City	6096	1	1999	OCT	2003.9	0.76				
NE	Nebraska City	6096	1	1999	NOV	1816.6	0.75				
NE	Nebraska City	6096	1	1999	DEC	1617.3	0.74	0.71	0.76	0.52	0.19
NE	Nebraska City	6096	1	2000	JAN	1476.7	0.72				
NE	Nebraska City	6096	1	2000	FEB	1197.1	0.70				
NE	Nebraska City	6096	1	2000	MAR	298.8	0.65				
NE	Nebraska City	6096	1	2000	APR	1371.3	0.67				
NE	Nebraska City	6096	1	2000	MAY	1351.1	0.67				
NE	Nebraska City	6096	1	2000	JUN	1231.8	0.69				
NE	Nebraska City	6096	1	2000	JUL	1270.1	0.64				
NE	Nebraska City	6096	1	2000	AUG	1356.7	0.63				
NE	Nebraska City	6096	1	2000	SEP	1331.8	0.68				
NE	Nebraska City	6096	1	2000	OCT	1526.9	0.69				
NE	Nebraska City	6096	1	2000	NOV	1406.3	0.67				
NE	Nebraska City	6096	1	2000	DEC	1408.6	0.65	0.67	0.72	0.63	0.05
NE	Nebraska City	6096	1	2001	JAN	1467	0.68				
NE	Nebraska City	6096	1	2001	FEB	878.9	0.67				
NE	Nebraska City	6096	1	2001	MAR	1500.8	0.67				
NE	Nebraska City	6096	1	2001	APR	1406.2	0.66				
NE	Nebraska City	6096	1	2001	MAY	1057.6	0.70				
NE	Nebraska City	6096	1	2001	JUN	1345.4	0.69				
NE	Nebraska City	6096	1	2001	JUL	1314.9	0.68				
NE	Nebraska City	6096	1	2001	AUG	1370.1	0.64				
NE	Nebraska City	6096	1	2001	SEP	1411.8	0.67				
NE	Nebraska City	6096	1	2001	OCT	1614.1	0.73				
NE	Nebraska City	6096	1	2001	NOV	1443.1	0.70				
NE	Nebraska City	6096	1	2001	DEC	1395.7	0.64	0.68	0.73	0.64	0.05
NE	Nebraska City	6096	1	2002	JAN	1258	0.63				
NE	Nebraska City	6096	1	2002	FEB	1108.1	0.58				
NE	Nebraska City	6096	1	2002	MAR	30.5	0.55				
NE	Nebraska City	6096	1	2002	APR	329.1	0.68				
NE	Nebraska City	6096	1	2002	MAY	1419.9	0.64				
NE	Nebraska City	6096	1	2002	JUN	1029.8	0.61				
NE	Nebraska City	6096	1	2002	JUL	1429.2	0.64				
NE	Nebraska City	6096	1	2002	AUG	1016.9	0.63				
NE	Nebraska City	6096	1	2002	SEP	1327	0.66				
NE	Nebraska City	6096	1	2002	OCT	1303	0.62				
NE	Nebraska City	6096	1	2002	NOV	1192.7	0.59				
NE	Nebraska City	6096	1	2002	DEC	1375.4	0.66	0.63	0.68	0.55	0.07

Monthly SO2 Inlet Rates for Public Power NSPS Subpart D Units in Region 7  
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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
NE	Platte	59	1	1997	JAN	219.5	0.65				
NE	Platte	59	1	1997	FEB	188.9	0.65				
NE	Platte	59	1	1997	MAR	190.4	0.65				
NE	Platte	59	1	1997	APR	162.6	0.66				
NE	Platte	59	1	1997	MAY	202.6	0.63				
NE	Platte	59	1	1997	JUN	221.8	0.69				
NE	Platte	59	1	1997	JUL	223.4	0.63				
NE	Platte	59	1	1997	AUG	217.7	0.64				
NE	Platte	59	1	1997	SEP	78.7	0.67				
NE	Platte	59	1	1997	OCT	0					
NE	Platte	59	1	1997	NOV	118.8	0.62				
NE	Platte	59	1	1997	DEC	179.7	0.60	0.64	0.69	0.60	0.05
NE	Platte	59	1	1998	JAN	277.7	0.90				
NE	Platte	59	1	1998	FEB	216.7	0.95				
NE	Platte	59	1	1998	MAR	235.7	0.88				
NE	Platte	59	1	1998	APR	199.7	0.82				
NE	Platte	59	1	1998	MAY	162.9	0.75				
NE	Platte	59	1	1998	JUN	189.7	0.68				
NE	Platte	59	1	1998	JUL	240.7	0.72				
NE	Platte	59	1	1998	AUG	273.1	0.82				
NE	Platte	59	1	1998	SEP	249.7	0.85				
NE	Platte	59	1	1998	OCT	185.2	0.97				
NE	Platte	59	1	1998	NOV	259.1	0.89				
NE	Platte	59	1	1998	DEC	291.6	0.92	0.84	0.97	0.68	0.17
NE	Platte	59	1	1999	JAN	244.2	0.75				
NE	Platte	59	1	1999	FEB	188.3	0.69				
NE	Platte	59	1	1999	MAR	228.2	0.70				
NE	Platte	59	1	1999	APR	179.3	0.75				
NE	Platte	59	1	1999	MAY	232.9	0.73				
NE	Platte	59	1	1999	JUN	216.5	0.71				
NE	Platte	59	1	1999	JUL	323.4	0.72				
NE	Platte	59	1	1999	AUG	241	0.70				
NE	Platte	59	1	1999	SEP	201.4	0.68				
NE	Platte	59	1	1999	OCT	130	0.70				
NE	Platte	59	1	1999	NOV	190.5	0.79				
NE	Platte	59	1	1999	DEC	187.9	0.71	0.72	0.79	0.68	0.07
NE	Platte	59	1	2000	JAN	236.4	0.74				
NE	Platte	59	1	2000	FEB	208.1	0.70				
NE	Platte	59	1	2000	MAR	194.6	0.66				
NE	Platte	59	1	2000	APR	199.1	0.69				
NE	Platte	59	1	2000	MAY	252.4	0.69				
NE	Platte	59	1	2000	JUN	215.1	0.65				
NE	Platte	59	1	2000	JUL	211.5	0.56				
NE	Platte	59	1	2000	AUG	212.6	0.57				
NE	Platte	59	1	2000	SEP	88.6	0.61				
NE	Platte	59	1	2000	OCT	180.3	0.79				
NE	Platte	59	1	2000	NOV	255	0.66				
NE	Platte	59	1	2000	DEC	243.3	0.61	0.66	0.79	0.56	0.14
NE	Platte	59	1	2001	JAN	236.8	0.63				
NE	Platte	59	1	2001	FEB	214.4	0.61				
NE	Platte	59	1	2001	MAR	202.9	0.60				
NE	Platte	59	1	2001	APR	236.2	0.62				
NE	Platte	59	1	2001	MAY	199.6	0.59				
NE	Platte	59	1	2001	JUN	216.4	0.64				
NE	Platte	59	1	2001	JUL	224.8	0.61				
NE	Platte	59	1	2001	AUG	216.4	0.59				
NE	Platte	59	1	2001	SEP	167.2	0.56				
NE	Platte	59	1	2001	OCT	136.3	0.55				
NE	Platte	59	1	2001	NOV	187.5	0.60				
NE	Platte	59	1	2001	DEC	197.8	0.58	0.60	0.64	0.55	0.05
NE	Platte	59	1	2002	JAN	221.4	0.64				
NE	Platte	59	1	2002	FEB	182.1	0.59				
NE	Platte	59	1	2002	MAR	271.4	0.69				
NE	Platte	59	1	2002	APR	173.8	0.65				
NE	Platte	59	1	2002	MAY	242.1	0.69				
NE	Platte	59	1	2002	JUN	192.9	0.54				
NE	Platte	59	1	2002	JUL	230.5	0.60				
NE	Platte	59	1	2002	AUG	215.3	0.59				
NE	Platte	59	1	2002	SEP	155.3	0.58				
NE	Platte	59	1	2002	OCT	0					
NE	Platte	59	1	2002	NOV	145.1	0.64				
NE	Platte	59	1	2002	DEC	220.3	0.60	0.62	0.69	0.54	0.08

Monthly SO2 Inlet Rates for Public Power NSPS Subpart D Units in Region 7  
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STATE	FACILITY_NAME	ORIS_CODE	UNITID	YEAR	MONTH	SUMSO2	Rate	Average	Max Rate	Min Rate	Max Difference from Average
Sums & Averages						321818.1		0.58			

Percentile of Monthly SO2 Rates	
50	0.58
95	0.82
97	0.84
99	0.93
99.5	0.97
100	2.05